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**From:** Hobel, Lawrence [Lhobel@cov.com]  
**Sent:** 9/7/2017 8:51:03 PM  
**To:** Bradfish, Larry [Bradfish.Larry@epa.gov]  
**CC:** Fennessy, Christopher (christopher.fennessy@Rocket.com) [christopher.fennessy@Rocket.com]; Hvidsten, William [william.hvidsten@Rocket.com]  
**Subject:** FW: Area 40 Request  
**Attachments:** [EXTERNAL] RE: December 8 meeting follow-up

Larry: I spoke briefly with Isabella, who wasn't able to recall receiving the draft you indicated had gone from EPA to DTSC (unless I misheard you). Is it possible for you to cause the draft to be sent to her (again).

Best,  
Larry

**Lawrence Hobel**

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**From:** Hobel, Lawrence  
**Sent:** Thursday, September 07, 2017 11:08 AM  
**To:** Alasti, Isabella@DTSC <Isabella.Alasti@dtsc.ca.gov>  
**Cc:** Fennessy, Christopher (christopher.fennessy@Rocket.com) <christopher.fennessy@Rocket.com>; 'peter.macnicholl@dtsc.ca.gov' <peter.macnicholl@dtsc.ca.gov>  
**Subject:** FW: Area 40 Request

Chris advises that this is the proposed language of a letter we requested EPA to issue. I understand that Peter MacNicholl is the project manager on the Area 40 site so I have also included him in distribution. I understand that EPA has been editing language and I had understood that Larry Bradfish had sent a draft back to DTSC, but I'm going to confirm.

Looking forward to continued discussions, etc.

Regards,  
Larry

**Lawrence Hobel**

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**From:** Fennessy, Christopher [<mailto:christopher.fennessy@Rocket.com>]  
**Sent:** Thursday, September 07, 2017 10:57 AM  
**To:** Hobel, Lawrence <[Lhobel@cov.com](mailto:Lhobel@cov.com)>  
**Subject:** FW: Area 40 Request

Christopher M. Fennessy, P.E.  
Aerojet Rocketdyne, Inc.  
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**From:** Fennessy, Christopher  
**Sent:** Monday, August 07, 2017 3:59 PM  
**To:** Keller, Lynn ([Keller.Lynn@epa.gov](mailto:Keller.Lynn@epa.gov))  
**Subject:** Area 40 Request

Hi Lynn – As we are wading our way through the impacts of not achieving the Purchase and Sale Agreement requirement of obtaining a ROD by September 1, 2018 for Area 40, we would like to request a letter from EPA that documents the process by which the Agencies are planning on proceeding with Area 40. This language would assist us with documenting that the RAP will be equivalent to the ROD and that EPA will still be in an oversight role throughout the remedy process. Can you please review the following language and let me know if this is something EPA can provide AR on EPA letterhead? Note, the yellow highlighted text was excerpted from the draft EPA-State agreement (attached). Thanks! Chris

On 28 October 2014, Aerojet Rocketdyne, the Responsible Party for the Aerojet Superfund site, sent a letter to the Environmental Protection Agency (EPA) Region 9 requesting that a new Operable Unit (OU) 10 be created at the site for Area 40. The City of Folsom also sent EPA Region 9 a letter on 16 July 2015 about Area 40 and its ties to the City's redevelopment plans as a utility corridor, open space, and a park area. In this letter, the City of Folsom requested that EPA expedite regulatory reviews and oversight of Area 40 in order to meet their redevelopment plans. The City of Folsom also asked that EPA consider evaluating Area 40 as a stand-alone site in order to fast track remedy selection and implementation.

Currently Area 40 is part of the Aerojet Islands OU (OU7). OU7 consists of several geographically isolated, highly contaminated source areas within the Aerojet Superfund site. OU7 is tracking for cleanup slower than Area 40 would on its own, due to technical complexity and baseline ecological risk assessment requirements. The current schedule for OU7 has Remedial Design (RD) and Remedial Action (RA) beginning in 2020, which would not meet the City of Folsom's current redevelopment schedule.

Following discussions and input from our interagency Aerojet working group, EPA plans to separate Area 40 from its current OU7, and establish it as new Aerojet OU10 and implement the following approach to expedite regulatory reviews and oversight of Area 40:

- EPA will create OU 10, which will consist solely of Area 40
- Following the finalization of the Feasibility Study for Area 40, EPA will establish an agreement with the State of California (State) giving the State lead regulatory authority for the Superfund process of OU 10
- The State will prepare a Remedial Action Plan (**RAP**), which is the State equivalent to EPA's Proposed Plan and Record of Decision (ROD) document. EPA will review, comment as necessary, and provide concurrence with the State RAP.

**Christopher M. Fennessy, P.E.**

**Aerojet Rocketdyne, Inc.**

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